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Timothy G. Blood (CA 149343)
(*Applicant for pro hac vice admission*)
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*Attorneys for Jun Dam and the Class in
Dam v. Perkins Coie, LLP, et al.,
Case No. 2:20-cv-00464-SAB (E.D. Wash.)*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington corporation,

Debtor.

Case No: 18-03197 FPC 7

Hon. Frederick P. Corbit Chapter 7

**DECLARATION OF TIMOTHY G.
BLOOD IN SUPPORT OF MOTION
TO ADMIT *PRO HAC VICE***

[No Hearing Requested]

**DECLARATION OF TIMOTHY G. BLOOD IN SUPPORT OF
MOTION TO ADMIT *PRO HAC VICE* - 1**

Western Washington Law Group PLLC
P.O. Box 468, Snohomish, WA 98291

I, Timothy G. Blood, under penalty of perjury, declare the following statements to be true and correct, based on my personal knowledge and information:

1. I am the managing partner of Blood Hurst & O'Reardon, LLP, and one of the attorneys of record for Creditor Jun Dam.

2. I make this declaration in support of the motion for my admission to practice *pro hac vice* before this Court for the limited purpose of this litigation.

A. Applicant's address and telephone number

Blood Hurst & O'Reardon, LLP
501 West Broadway, Suite 1490
San Diego, CA 92101
Tel: (619) 338-1100

B. Dates of admission to practice before other courts

Mr. Blood is admitted to practice in the following courts:

- California State Courts as of 12/5/1990 (CA 149343)
- U.S. District Court, Southern District of California as of 12/5/1990
- U.S. District Court, Central District of California as of 12/2/1992
- U.S. District Court, Northern District of California as of 7/16/1997
- U.S. District Court, Eastern District of California as of 7/13/2003
- Ninth Circuit Court of Appeals as of 6/25/1997
- United States Supreme Court as of 1/25/2016
- United States Circuit Court of Appeals for the Second (4/11/2017), Third (3/6/2008), Fifth (4/6/2000), Sixth (9/23/1999), Eighth (4/20/2001) and Eleventh Circuits (8/4/2000)
- United States District Courts for the E.D. Arkansas (11/19/2003), W.D. Arkansas (11/19/2003), N.D. Illinois (1/20/2016) and E.D. Michigan (5/20/2010)

1 **C. Name, address and telephone number of associated admitted counsel**

2 Dennis McGlothin (WSBA No. 28177)
3 Western Washington Law Group PLLC
4 P.O. Box 468
5 Snohomish, WA 98291
6 Tel: 425/728-7296
7 425/955-5300 (fax)
8 Dennis@westwalaw.com

9 **D. Necessity for appearance by applicant**

10 I am one of the counsel for Plaintiff and the proposed Class in *Dam v. Perkins Coie, LLP, et al.*, Case No. 2:20-cv-00464-SAB (E.D. Wash.) (the "Class Action"). I have been admitted *pro hac vice* in the Class Action.

11 I am the managing partner of Blood Hurst & O'Reardon, LLP and
12 specializes in class action litigation. I have significant experience leading the
13 litigation of complex class action lawsuits. I have been appointed lead counsel by
14 numerous state and federal courts, including in complex and multidistrict
15 litigation.

16 On June 18, 2018, Mark D. Waldron, the chapter 7 trustee in this matter,
17 filed a motion for an order to show cause why nominal plaintiff Jun Dam should
18 not be sanctioned for violating the automatic stay by pursuing the Class Action
19 against non-debtors. ECF Nos. 889-90. Plaintiff's opposition to Trustee's motion
20 for an OSC is due July 22, 2021. I wish to appear and participate in this
21 proceeding, including to present oral argument if permitted.

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1 **E. Disciplinary actions or sanctions**

2 I have no pending disciplinary sanction or actions and have never been
3 subject to disciplinary sanctions by any court or Bar Association.

4 I declare under penalty of perjury under the laws of the United States of
5 America and the state of Washington, that the foregoing is true and correct.

6 Respectfully submitted this 22nd day of July, 2021.

7

8 *s/ Timothy G. Blood*

9 Timothy G. Blood, Applicant for
10 *pro hac vice* admission
11 Blood Hurst & O'Reardon, LLP
12 501 West Broadway, Suite 1490
13 San Diego, CA 92101
14 Tel: 619/338-1100
15 tblood@bholaw.com

16

17 *Attorneys for Jun Dam and the Class in*
18 *Dam v. Perkins Coie, LLP, et al., Case No.*
19 *2:20-cv-00464-SAB (E.D. Wash.)*

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will in turn automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed on July 22, 2021.

s/ Dennis McGlothin

DENNIS J. McGLOTHIN